

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

TARA S. HOPPER, on behalf of)	
herself and all others similarly situated,)	Judge Edmond A. Sargus
)	
Plaintiff,)	Case No.: 2:20-cv-00522
)	
v.)	Magistrate Judge Chelsea M. Vascura
)	
CREDIT ASSOCIATES, LLC,)	
and TRANS UNION,)	
)	
Defendants.)	

**CREDIT ASSOCIATES, LLC’S MOTION TO DISMISS
PLAINTIFF’S SECOND AMENDED COMPLAINT
FOR LACK OF SUBJECT MATTER JURISDICTION**

NOW COMES Defendant Credit Associates, LLC, by and through undersigned counsel, and pursuant to Federal Rule of Civil Procedure 12(b)(1) hereby moves to dismiss Plaintiff’s Second Amended Complaint for lack of subject matter jurisdiction. A memorandum of law is being filed contemporaneously with and in support of this motion and is incorporated herein by reference.

WHEREFORE, Defendant Credit Associates, LLC respectfully moves this Honorable Court to grant its Motion to Dismiss pursuant to Federal Rule of Civil Procedure 12(b)(1) and dismiss Plaintiff’s Second Amended Complaint with prejudice, and for all further and additional relief that this Court deems equitable and just.

Dated: April 28, 2021

Respectfully Submitted,

s/ Andrew E. Cunningham

Andrew E. Cunningham (*pro hac vice*)
Sessions, Israel, & Shartle, LLC
141 West Jackson Boulevard, Suite 3550
Chicago, Illinois 60604
Telephone: (312) 578-0992
Email: acunningham@sessions.legal

Matthew L. Schrader (0074230)
Reminger Co., L.P.A.
200 Civic Center Drive, Suite 800
Columbus, Ohio 43215
Telephone: (614) 232-2631
Email: mschrader@reminger.com

*Attorneys for Defendant
Credit Associates, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on April 28, 2021, a true and correct copy of **Credit Associates, LLC's Motion to Dismiss Plaintiff's Second Amended Complaint for Lack of Subject Matter Jurisdiction** was filed electronically in the ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/ Andrew E. Cunningham

*Attorney for Defendant
Credit Associates, LLC*